

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
) Case No. 4:19-cv-00415
v.)
) Filed Electronically
ALEXANDRU BITTNER,)
Defendant.)

**DEFENDANT ALEXANDRU BITTNER'S UNOPPOSED MOTION FOR LEAVE TO
FILE FIRST AMENDED ANSWER**

Defendant, Alexandru Bittner ("Bittner"), by his undersigned counsel, respectfully move the Court for leave to file a first amended answer and in support thereof, state as follows:

1. The Court's Scheduling Order (Doc. 9) provides that January 2, 2020 is the deadline for Defendant's final amended pleadings.
2. Bittner desires to amend his Answer to add defenses under the Administrative Procedures Act, the Equal Protection and Due Process Clauses of the Fifth Amendment, and to make other edits for purposes of clarification.
3. Defendant's counsel has conferred with Plaintiff's counsel concerning this motion and the proposed amendment, and Plaintiff does not object to the filing of an amended answer but is not in agreement with the defenses or relief sought.

WHEREFORE, Defendant respectfully requests the Court to grant this Motion.

Dated: January 2, 2020

Respectfully submitted,

CLARK HILL STRASBURGER

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 2, 2020, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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